

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate
of Bernard L. Madoff,

Plaintiff,

v.

BANQUE INTERNATIONALE À LUXEMBOURG
S.A. (*f/k/a* Dexia Banque Internationale à
Luxembourg S.A.); RBC INVESTOR SERVICES
BANK S.A. (*f/k/a* RBC Dexia Investor Services Bank
S.A.); RBC INVESTOR SERVICES TRUST (*f/k/a*
RBC Dexia Investor Services Trust); BANCO
INVERSIS, S.A., as successor in interest to RBC
Dexia Investor Services España S.A.; and BANQUE
INTERNATIONALE À LUXEMBOURG (SUISSE)
S.A. (*f/k/a* Dexia Private Bank (Switzerland) Ltd.),

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation
(Substantively Consolidated)

Adv. Pro. No. 12-01698 (CGM)

**SECOND STIPULATION AND ORDER
TO EXTEND INITIAL DISCLOSURE DEADLINE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation
of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor
Protection Act, 15 U.S.C. §§ 78aaa–*III*, and the estate of Bernard L. Madoff, under Chapter 7 of
the United States Bankruptcy Code, 11 U.S.C. §§ 701-784, and defendants Banque

Internationale à Luxembourg S.A. (*f/k/a* Dexia Banque Internationale à Luxembourg S.A.),
Banque Internationale à Luxembourg (Suisse) S.A. (*f/k/a* Dexia Private Bank (Switzerland)
Ltd.), RBC Investor Services Bank S.A. (*f/k/a* RBC Dexia Investor Services Bank S.A.), RBC
Investor Services Trust (*f/k/a* RBC Dexia Investor Services Trust), and Banco Inversis, S.A. (as
successor in interest to RBC Dexia Investor Services España S.A.) (collectively, “Defendants,”
and together with the Trustee, the “Parties”), by and through their respective undersigned
counsel, stipulate and agree as follows:

WHEREAS, on June 30, 2023, this Court entered a Case Management Plan in this
action, which required that the Parties serve initial disclosures on or before August 29, 2023 (the
“Initial Disclosure Deadline”) (ECF No. 191);

WHEREAS, on August 24, 2023, this Court entered a stipulation and order, pursuant to
which the Initial Disclosure Deadline was extended to September 12, 2023 (ECF No. 192); and

WHEREAS, Defendants requested, and the Trustee agreed to, a further extension of the
Initial Disclosure Deadline.

IT IS HEREBY STIPULATED AND AGREED, by the Parties, and **SO ORDERED**,
by the Court:

1. The Initial Disclosure Deadline shall be extended to September 29, 2023.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they
may have, and their entry into this stipulation shall not impair or otherwise affect
any such rights, arguments, objections, and defenses.

[*Signatures on following page*]

Dated: September 11, 2023
New York, New York

/s/ Howard L. Simon
Windels Marx Lane & Mittendorf, LLP

Howard L. Simon
Kim M. Longo
Alan D. Lawn
156 West 56th Street
New York, New York 10019
Telephone: (212) 237-1000
hsimon@windelsmarx.com
klongo@windelsmarx.com
alawn@windelsmarx.com

*Special Counsel for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7
Estate of Bernard L. Madoff*

/s/ Mark T. Ciani
Katten Muchin Rosenman LLP

Anthony L. Paccione
Mark T. Ciani
50 Rockefeller Plaza
New York, New York 10020
Telephone: (212) 940-8800
anthony.paccione@katten.com
mark.ciani@katten.com

*Attorney for Defendants RBC Investor Services
Bank S.A., RBC Investor Services Trust, and
Banco Inversis, S.A. (as successor in interest to
RBC-Dexia España)*

/s/ Jeff E. Butler
Clifford Chance US LLP

Jeff E. Butler
31 West 52nd Street
New York, New York 10019
Telephone: (212) 878-8000
jeff.butler@cliffordchance.com

*Attorney for Defendants Banque Internationale
à Luxembourg S.A. (f/k/a Dexia Banque
Internationale à Luxembourg S.A.) and Banque
Internationale à Luxembourg (Suisse) S.A.
(f/k/a Dexia Private Bank (Switzerland) Ltd.)*

SO ORDERED.

**Dated: September 13, 2023
Poughkeepsie, New York**

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/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**